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11 Attorneys for PLAINTIFF
12 ROBERT HUNTER BIDEN

13 **UNITED STATES DISTRICT COURT**

14 **CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION**

15 ROBERT HUNTER BIDEN, an
16 individual,

17 Plaintiff,

18 vs.

19 PATRICK M. BYRNE, an individual,
20 Defendant.

Case No. 2:23-cv-09430-SVW-PD

**PLAINTIFF ROBERT HUNTER
BIDEN'S REQUEST FOR
COUNSEL TO APPEAR
REMOTELY FOR AUGUST 18,
2025 STATUS CONFERENCE
HEARING ON PLAINTIFF
ROBERT HUNTER BIDEN'S *EX*
PARTE APPLICATION;
DECLARATION OF BRYAN M.
SULLIVAN**

*[[Proposed] Order filed and served
concurrently herewith]*

Date: August 18, 2025
Time: 1:30 P.M.
Crtrm.,: 10A

Judge: Hon. Stephen V. Wilson

1 **TO THE HONORABLE COURT, ALL PARTIES AND THEIR**
2 **ATTORNEYS OF RECORD**, Plaintiff Robert Hunter Biden (“Plaintiff”) hereby
3 respectfully requests permission from this Court for his Counsel, Bryan M. Sullivan,
4 Esq., to appear remotely by way of videoconference (e.g. Zoom) for the status
5 conference hearing on Plaintiff’s *Ex Parte* Application scheduled in this case for
6 August 18, 2025 at 1:30 p.m. (the “Hearing”). Good cause exists to grant this request
7 because Mr. Sullivan has been involved in all aspects of the case. (Declaration of
8 Bryan M. Sullivan, at ¶ 2.) However, at this time, Mr. Sullivan is unable to be in the
9 State of California on, Monday, August 18, 2025, due to the fact that he resides in
10 Virginia and has family/child care obligations that prevent him from traveling to
11 California and attending the Hearing in person at that time, for which he received
12 notice on Thursday, August 14, 2025. Accordingly, Plaintiff respectfully requests
13 that the Court grant this request for Mr. Sullivan to appear remotely by
14 videoconference at the Hearing.

15 Dated: August 14, 2025

EARLY SULLIVAN WRIGHT
GIZER & MCRAE LLP

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18 By: /s/ Bryan M. Sullivan

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Attorney for Plaintiff
Robert Hunter Biden

DECLARATION OF BRYAN M. SULLIVAN

I, Bryan M. Sullivan, declare and state as follows:

1. I am counsel of record for Plaintiff Robert Hunter Biden (“Plaintiff”) in the above-entitled action and am over the age of 18. I hereby submit this declaration in support of Plaintiff’s Request for Counsel to Appear Remotely for the status conference hearing on Plaintiff’s *Ex Parte* Application scheduled in this case for August 18, 2025 at 1:30 p.m. (the “Hearing”). If called as a witness, I would and could testify to the matters contained herein.

2. I have been involved in all aspects of this case, and my participation in the Hearing is, therefore, necessary.

3. I just received notice of the August 18, 2025 hearing on August 14, 2025 and am unable to be in the State of California on August 18, 2025 because I reside in Virginia and have family/child care obligations that week that prevent me from traveling to California and attending the Conference in person.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 14th of August, 2025, at Roanoke, Virginia.

/s/ Bryan M. Sullivan
Bryan M. Sullivan